

IN THE UNITED STATES BANKRUPTCY COURT
Western District of North Carolina
Statesville Division

In the Matter of:	}	
	}	Case No. 18-50455
Michael James Garvey	}	
	}	
	}	Chapter 13
<u>Debtor</u>	}	

RESPONSE TO MOTION FOR RELIEF FROM STAY

NOW COMES Debtor, by and through counsel, and in response to the Motion for Relief from Stay filed herein by Nationstar Mortgage LLC d/b/a Mr. Cooper (hereinafter "Creditor") respectfully request that the motion be denied and allege the following:

1. Debtor filed a Chapter 13 petition with this Court on July 13, 2018.
2. Debtor has filed a Motion to enter into the Loan Modification Management program.
3. Debtor request any foreclosure activity is stayed until a modification is thoroughly reviewed for approval and a determination made on a modification.

WHEREFORE, Debtor prays the Court as follows:

1. That the prayer for relief of the Creditor's motion be denied;
2. That this Court continues in full force and effect the provisions of the automatic stay;
3. And for such other and further relief as the Court deems just and proper.

This the 10th day of January, 2020.

/s/ Beth B. Carter
Beth B. Carter
The Law Offices of Beth B. Carter, PLLC
N.C. State Bar 24642
Post Office Box 1553
Denver, NC 28037

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Certificate of Service by Mail

I hereby certify that I have this day served the Response to Motion for Relief by depositing the same in a postpaid envelope properly addressed to each party or his attorney of record in a post office or other official depository under the exclusive care and custody of the United States Postal Service or via electronic court filing where noted.

Steven Tate Chapter 13 Trustee 212 Cooper Street Statesville, NC 28687	via ECF
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Shelly Koon Abel, Bankruptcy Administrator 402 West Trade Street, Suite 205 Charlotte, NC 28202	via ECF
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Mr. Michael Garvey
330 Walter Godbey Rd
West Jefferson, NC 28694

Seterus, Inc.
PO Box 1047
Hartford, CT 06143

Nationstar Mortgage LLC
d/b/a Mr. Cooper
c/o Joseph J. Vonnegut
HUTCHENS LAW FIRM
Bankruptcy Department
Post Office Box 2505
Fayetteville, NC 28302

Nationstar Mortgage LLC
Bankruptcy Department
PO Box 619096
Dallas TX 75261-9741

This is the 10th day of January, 2020.

/s/ Beth B Carter
Beth B. Carter
NC Bar # 24642
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Denver, NC 28037